

October 16, 2024

By ECF

Hon. Anne M. Donnelly
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Sylla, et al. v. Amazon Labor Union et al.
Civil Case No. 23-05261 (AMD)
Letter Motion for An Order Discontinuing Case

Dear Judge Donnelly:

Given the current situation, with the officers elected on July 30, 2024 functioning in their offices with full access to all of the Amazon Labor Union's resources, Plaintiffs move for an Order, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure for an Order of Dismissal which preserves the right of Plaintiffs to apply for attorney's fees. *Rosario v. Amalgamated Ladies' Garment Cutters' Union, Local 10, I.L.G.W.U.*, 605 F.2d 1228, 1245 (2nd Cir. 1979)

I believe, based on our conference today with Magistrate Merkle, that Defendants' Counsel will not oppose this motion. I have submitted a proposed order.

I have copied attorney Louie Nikolaidis, who I expect will be substituting in for Ms. Mirer for any future litigation.

Thank you for your successful supervision of this matter.

Respectfully submitted,

/s/ *Arthur Z. Schwartz*
Arthur Z. Schwartz

cc: Jeanne Mirer, Esq. (via ECF)
Louie Nikolaidis, Esq (via email)